

1 [Parties and Counsel Listed on Signature Pages]

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

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**IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION**

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MDL No. 3047

Case No. 4:22-md-03047-YGR

This Document Relates to:

The Baltimore City Board of School Commissioners
v. Meta, et al.,
Case No. 23-cv-04064

**STIPULATION AND [PROPOSED]
ORDER REGARDING RULE
26(a)(1)(A)(i) IDENTIFICATION OF
PRIORITY WITNESSES IN SCHOOL
DISTRICT CASES**

Board of Education Harford County v. Meta, et al.,
Case No. 23-cv-03065

Judge: Hon. Yvonne Gonzalez Rogers

Board of Education of Jordan School District v.
Meta, et al.,
Case No. 24-cv-01377

Magistrate Judge: Hon. Peter H. Kang

Breathitt County Board of Education v. Meta, et al.,
Case No. 23-cv-01804

Charleston County School District v. Meta, et al.,
Case No. 23-cv-04659

Dekalb County School District v. Meta, et al.,
Case No. 23-cv-05733

Irvington Public Schools v. Meta, et al.,
Case No. 23-cv-01467

Saint Charles Parish Public Schools v. Meta, et al.,
Case No. 24-cv-01098

School District of the Chathams v. Meta, et al.,
Case No. 23-cv-01466

Spartanburg 6 School District v. Meta, et al.,
Case No. 24-cv-00106

The School Board of Hillsborough County, Florida
v. Meta, et al.,
Case No. 24-cv-01573

Tucson Unified School District v. Meta, et al.,
Case No. 24-cv-01382

The Parties STIPULATE and AGREE as follows:

1. Each Bellwether School District (“BW SD Plaintiff”) identifies the following list of up to six (6) anonymized priority witnesses (“Priority Witnesses”):

THE BALTIMORE CITY BOARD OF SCHOOL COMMISSIONERS V. META, ET AL.,	
AL., Case No. 23-cv-04064	
S.S.	
T.S.	
S.B.	
K.S.	
E.B.	
L.H.	
BOARD OF EDUCATION HARFORD COUNTY v. META, ET AL.,	
Case No. 23-cv-03065	
B.H.	
B.W.	
D.J.	
BOARD OF EDUCATION OF JORDAN SCHOOL DISTRICT v. META, ET AL.,	
Case No. 24-cv-01377	
M.A.	
B.D.	
T.H.	
B.S.	
S.W.	
BREATHITT COUNTY BOARD OF EDUCATION v. META, ET AL.,	
Case No. 23-cv-01804	
J.H.	
K.H.	
D.N.	
S.M.	
H.W.	
P.W.	
CHARLESTON COUNTY SCHOOL DISTRICT v. META, ET AL.,	
Case No. 23-cv-04659	
A.H.	
S.C.	
S.E.	
L.A.	
M.R.	
E.N.	
DEKALB COUNTY SCHOOL DISTRICT v. META, et al.	
Case No. 23-cv-05733	
K.T.	
D.R.	

1	N.S.
2	D.L.
3	B.S.
IRVINGTON PUBLIC SCHOOLS v. META, ET AL., Case No. 23-cv-01467	
4	A.V.
5	S.P.
6	M.B.
7	K.Z.
8	D.M.
9	R.L.
SAINT CHARLES PARISH PUBLIC SCHOOLS v. META, ET AL., Case No. 24-cv-01098	
10	K.O.
11	J.S.
12	D.S.
13	R.W.
14	K.R.
15	J.R.
SCHOOL DISTRICT OF THE CHATHAMS v. META, ET AL., Case No. 23-cv-01466	
16	M.L.
17	E.S.
18	C.H.
19	L.G.
20	K.C.
21	L.L.
SPARTANBURG 6 SCHOOL DISTRICT v. META, ET AL., Case No. 24-cv-00106	
22	O.D.
23	J.F.
24	A.K.
25	K.K.
THE SCHOOL BOARD OF HILLSBOROUGH COUNTY, FLORIDA v. META, ET AL., Case No. 24-cv-01573	
26	S.B.
27	G.B.
28	T.B.
J.G.	
M.H.	
TUCSON UNIFIED SCHOOL DISTRICT v. META, ET AL., Case No. 24-cv-01382	
R.C.	
J.H.	
R.S.	

A.S.
J.S.
G.T.

2. If a BW SD Plaintiff relies on a non-Priority Witness's declaration or affidavit in Rule 702 or summary judgment briefing, the BW SD Plaintiff shall make that witness available for a deposition of up to four and one-half (4.5) hours.¹ This deposition must occur at least seven (7) calendar days before the response brief is due to allow Defendants time to use the transcript in their response.

3. If a BW SD Plaintiff includes a non-Priority Witness on their Trial Witness List, the BW SD Plaintiff shall make that witness available for a deposition of up to four and one-half (4.5) hours at a mutually agreed-upon time.²

4. Defendants hereby withdraw their prior request for more hours for depositions in *Dekalb County School District v. Meta, et al.*, Case No. 23-cv-05733, beyond the Court-ordered 35 hours.

5. Defendants reserve their right to seek additional deposition hours for any BW SD Plaintiff for "good cause." After meeting and conferring with the BW SD Plaintiff, Defendants may seek Court approval by submitting a joint brief demonstrating the need for additional time.

6. Defendants reserve all rights regarding arguments as to whether any witness's testimony (or any portion of a witness's testimony) is relevant or admissible.

PURSUANT TO STIPULATION, IT IS SO ORDERED,

¹ Defendants may request a deposition longer than four and one-half (4.5) hours if they establish "good cause." After meeting and conferring, Defendants may seek Court approval by submitting a joint brief demonstrating the need for additional time.

² See footnote 1.

1 DATED: March 11, 2025

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HONORABLE PETER H. KANG
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted,

Dated: March 10, 2025

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Attorneys for Plaintiffs

Dated: March 10, 2025

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ATTESTATION

I, Bailey J. Langner, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: March 10, 2025

By: /s/ Bailey J. Langner
Bailey J. Langner